

LDW/SF
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TSCA INSPECTION REPORT

9-13-89

MALARKEY ASPHALT

FACILITY ADDRESS

Malarkey Asphalt
8700 Dallas Ave.
Seattle, WA. 98108

SITE ADDRESS

Malarkey Asphalt
8700 Dallas Ave.
Seattle, WA 98108

TELEPHONE NO.

(206) 762-3600

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SITE CONTACTS:

Donald Lewis, General Manager, (206) 762-3600

DATE AND TIME OF INSPECTION:

9-13-89 @ 1015 hours

NAME AND TITLE OF INSPECTOR/S:

W. Douglas Smith, Senior Compliance Investigator
Daniel Tangarone, Environmental Engineer

BACKGROUND OF FACILITY:

This facility manufactures roofing asphalt. Their product is sold either in bulk and loaded in heated tanker trucks or in tubes to be heated and prepared at the job site. The raw product comes from Chevron at Richmond Beach. Mopping grade flux is bought from Chevron and Malarkey blows off the lites at about 400-500 degrees F. The Malarkey furnaces are gas fired and burn about \$3000.00 to \$6,000.00 in gas per month. The furnaces must be kept going at all times. Even when there is no production so that the bulk tanks contents will not take a hard set. The lite oils are burned in the afterburner of the furnace. Viscosity is about 275

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@ 400 degrees F. The asphalt is shipped at 400 degrees F.

The company was established in 1978, but the site has been involved as an asphalt plant since the early 1900's.

Mr. Lewis said that the company is presently in the "thinking stage" about using waste oils to heat the asphalt rather than gas. The facility is equipt to burn either he stated and can alternate between the two.

Some waste oils are generated at the site in amounts of about 5-600 gallons per month. Two waste haulers are used to pick up waste oils. These are Petroleum Engineering Corp. 2000 Ginko St., Auburn, WA; and Vintage Oil, operated by Terry Drexler. Both of these companies in turn deliver their oil to the Bill Briggs companies of Oil ReRefining Co. Inc. in Woodland, WA or Fuel Processors, in Portland.

There is a yard across the street from Malarkey that they also own. They have leased the property to Front Water Inc., Mr. Lewis said. County property records and the License department indicates that Front Water Inc. is also a Malarkey enterprise.

Tanks and parking space on the Malarkey Asphalt plant property is leased to John Laxdal, Petroleum Engineering Corp, 2000 Ginkgo St. SE, Auburn, WA; and Terry Drexler, Basin Oil, Redmond, WA. Mr. Laxdal has two tanks that he uses, Mr. Lewis said. (Note: Information gained from a driver for Mr. Laxdal stated that Mr. Laxdal also used a third tank which is underground and on the north side of the warehouse to the east of where Mr. Laxdal usually parks his tanker trailer.) Mr. Lewis stated that Mr. Drexler used an old insulated tank adjacent to the warehouse on the north west side and parked his truck for transfer delivery to a Vintage Oil truck in the adjacent roadway.

ENFORCEMENT HISTORY:

An SPOC inspection was conducted at this facility. Entry was not granted and the inspection team conducted the inspection through the fence.

CREDENTIALS AND NOTICES:

Credentials and Notices of Inspection were given to Donald C. Lewis, General Manager. Mr. Tangarone was introduced and also showed his credentials. Business cards were exchanged.

RECORDS:

I asked Mr. Lewis if he had any PCB equipment of any kind? He said that he had several air cooled transformers. He further stated that he did not have any capacitors, and that they routinely test all their oils for PCBs.

FIELD INVESTIGATION:

Mr. Lewis gave us permission to inspect the yard and accompanied us for a tour of the facility. Photographs were taken as we walked through the plant.

The plant was in generally poor maintenance with many housekeeping problems with overflows of product and equipment in poor condition. The berm did not contain all the bulk liquid storage and did not appear to be continuous and impermeable (see photographs).

We inspected three transformers on the plant grounds and found them to be dry type.

On the north side of the property we visited the loading dock. There were about 40 55-gallon drums solvents and other liquid materials stored on the dock. Some of the drums were full but not identified. Some of the drums were in rusted and deteriorated condition. Mr. Lewis said that they stored the drums at this location and had done so for over a year. I commented that there appeared to be little spill control or labeling of the contents of the drums. Mr. Lewis said that even he wasn't sure what was in some of the drums. I asked if he had had a RCRA inspection? Mr. Lewis said that he had not. I stated that the drum storage area probably would not satisfy the RCRA drum storage requirements for hazardous materials, and that without identification some of the drums would have to be classified as hazardous. (Photographs were taken by Daniel Tangarone. See attached)

After the tour we obtained permission to take samples of the bulk tanks and said that we would return after first breaking for lunch.

Upon returning from lunch, Terry Drexler was observed off-loading waste oil from his tanker truck to the old insulated tank on the north west side of the warehouse. We spoke to him and volunteered samples of the oil from his tanker truck and the bulk tank he was filling from the truck.

(Note: Preliminary laboratory analysis data indicates that the oil in the truck was over 900 ppm total halogens, and the bulk tank was over 1000 ppm total halogens.)

Mr. Drexler said that Front Water was a joint venture with Malarkey Asphalt. This was later checked with county and state records and found to be true. Basin Oil is also joint ventured with Malarkey for a bilge water collection operation. Mr. Drexler said that Mr. Laxdal is a competitor and does not have a WAD number under RCRA. Mr. Drexler said that we should "nail" Laxdal for not having a WAD number. Mr. Drexler said that he had one and presented me with his business card. (attached to notebook) The WAD number shown on that card was for a facility in Tacoma which he no longer operates and is therefore invalid itself. Mr. Drexler had a business card for Malarkey Asphalt, Vintage Oil, Petroleum Engineering, Basin Oil, RAMCOR, and a small sheet of paper advertising another operation at the RAMCOR operation in Orting, WA. This indicated that a Mike Kubicek was a hauler working out of that location. (See attached copy) Mr. Drexler stated that the Orting site was now being operated by a new company. He said that he thought that it was related to Laxdal in some way. I asked him if he still picked up sump water and stored equipment at the Orting site? He said that he did. I asked him if he delivered waste oils from Orting to Vintage Oil? He said that he did. I asked if William Briggs, of Vintage Oil gave him listings of pickups to be made for waste oil? Mr. Drexler said that Mr. Briggs did receive orders for him. I asked if Mr. Briggs received a commission for this service? Mr. Drexler said that Mr. Briggs did not receive a commission for that service.

Mr. Drexler then began asking me about the Orting Lumber tank farm in Orting, WA. He wanted to know who I thought the drums containing hazardous material belonged to? I said, "They are Andersons, aren't they?" He said that is how he saw it. He talked at length about how the drums were deteriorating and leaking into the ground and the ground belonged to Anderson, therefore the contamination was his problem.

The tank Mr. Drexler was pumping into did not have a berm and would probably not satisfy SPCC requirements.

No capacitors were observed.

No liquid filled equipment was observed which would be likely to contain PCB contaminated liquids other than the bulk systems sampled.

Six samples were taken. Two from Mr. Drexler's operation. Two from tanks used by Laxdal, and two from the Malarkey operations. (See field lab data sheet attached)

DEBRIEFING:

Debriefing took place in Mr. Lewis' office. I explained that there was some concern over the approximately 40 drums of solvents and unknown materials at the loading dock of his property, and that he should be aware

that waste oils used by people storing material in his bulk tanks should be included in his contingency plans. I stated that there did not appear to be materials regulated under the PCB regulations at his facility.

SAMPLING:

There were 6 samples taken. Sample numbers were 89380010 to 89380015.

SAFETY:

Level D is necessary. Care should be taken with hot liquids, and moving equipment.

ATTACHMENTS:

- A. Notices
- B. Notebook
- C. Photographs
- D. Field Lab data sheet
- E. Receipt for samples

10/15/89
DATE


SIGNATURE AND TITLE